

May 17, 2006

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Docket Clerk

Fruit & Vegetable Programs AMS, USDA
 1400 Independence Avenue, SW
 Mail Stop o243
 Washington, DC 20250-0243

Re: Docket Number FV06-1290-1PR
 FR Vol. 71, No. 76, pages 20353-20357

To Whom It May Concern:

The National Grape and Wine Initiative appreciates the opportunity to provide comment on the proposed rule regarding the Specialty Crop Block Grant program.

The National Grape and Wine Initiative (NGWI) is a coalition of grape producers, processors and wineries, and land-grant based viticulture research and extension education personnel from across the United States. Our coalition includes all facets of the U.S. grape industry, including grapes produced for wine, table, raisins, and juice.

NGWI's focus is to grow and expand the industry, both domestically and internationally, from its current estimated level of \$50 billion to \$150 billion by the year 2020. To do so, we are seeking expanded funding for applied viticulture research and technology transfer to make our industry competitive in production and processing the highest quality grape products. We expect to provide direct oversight of research development and transfer so that it is cost-effective and available to all involved in the grape industry across the U. S.

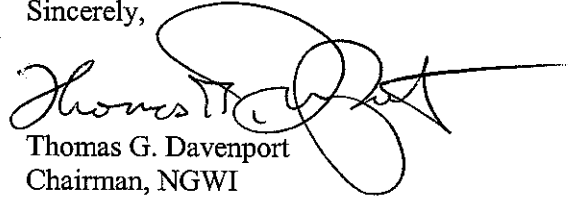
We recognize and appreciate support for specialty crops and in particular, grapes, that is provided by the United States Department of Agriculture (USDA). NGWI is working closely with many USDA departments to expand and grow our industry.

However, we are very concerned about the language in the Specialty Crop Block Grant program proposal that gives priority to "fresh" products in deference to processed products. We firmly believe that USDA emphasis should promote a well-rounded, nutritious diet that includes fruits and vegetable in whatever form they may be consumed.

The USDA's Food Guide Pyramid states requirements for the fruit and vegetable groups as, "Any fruit or 100% fruit juice counts as part of the fruit group. Fruits may be fresh, canned, frozen, or dried, and may be whole, cut-up, or pureed." It's evident that the proposed rule giving priority to "fresh" products is in direct conflict to USDA's own Food Guide Pyramid. It also appears that the authorizing legislation, the Specialty Crops Competitiveness Act of 2003, does **not** mandate distinction between fresh and processed.

We strongly encourage USDA to remove the words "priority for fresh..." from the proposed rule. Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas G. Davenport", with a large, stylized flourish extending to the right.

Thomas G. Davenport
Chairman, NGWI